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3 District of Arizona

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15 Attorneys for Plaintiff

16 IN THE UNITED STATES DISTRICT COURT  
17 FOR THE DISTRICT OF ARIZONA

18 United States of America,  
19  
20 Plaintiff,  
21  
22 v.  
23  
24 Abdul Malik Abdul Kareem,  
25  
26 Defendant.

No. CR-15-00707-01-PHX-SRB

**MOTION TO CONTINUE  
SENTENCING  
(EXPEDITED CONSIDERATION  
REQUESTED)**

27 The United States of America, through undersigned counsel, respectfully moves to  
28 continue the sentencing for a brief period of time to a date agreeable to the Court and  
defense counsel. As undersigned counsel recently informed the Court and defense counsel,  
a new Assistant United States Attorney (AUSA) is joining the case based on recent  
guidance from the DOJ Executive Office for United States Attorneys, Office of General  
Counsel (OGC). The new AUSA is reviewing the materials in the case in preparation for  
the upcoming hearing on October 19, 2021, and does not believe he can be fully prepared  
by that date. The reasons giving rise to this motion occurred only recently, and the motion  
is not for the purpose of delay.

The government respectfully requests expedited consideration of this motion. As  
the Court is aware, undersigned counsel committed to providing discovery regarding the

1 identity of the prisoner witnesses along with impeachment information for those witnesses  
2 on October 15, 2021. The disclosure is ready to go to the defense at this time. However,  
3 in the absence of a protective order regarding that information, it would be inappropriate  
4 to turn the information over this date if the hearing is to be continued because early release  
5 of the information would jeopardize the safety of the prisoner witnesses as more fully  
6 described in the government's response to Kareem's Motion to Compel Disclosure.

7 Undesigned counsel have contacted defense counsel regarding this motion, and  
8 defense counsel do not oppose the motion.

9 Excludable delay will not occur as a result of this motion or an order based thereon.

10 Respectfully submitted this 15<sup>th</sup> day of October, 2021.

11 GLENN B. McCORMICK  
12 Acting United States Attorney  
District of Arizona

13 *s/Kristen Brook*  
14 *s/Joseph E. Koehler*  
15 KRISTEN BROOK  
JOSEPH E. KOEHLER  
Assistant U.S. Attorneys

16  
17 CERTIFICATE OF SERVICE

18 I hereby certify that on the 15<sup>th</sup> day of October, 2021, I electronically filed the  
19 foregoing with the Clerk of Court using the CM/ECF system, and that true and accurate  
20 copies have been transmitted electronically to counsel for the defendant via the ECF  
system.

21 Daniel Maynard and Daniel Drake, Attorneys for Defendant

22 By: /s Joseph E. Koehler  
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